

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD V. HALL
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2019 AUG 28 PM 3:21

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL M. ALEXANDER

Defendant.

CASE NO. 2:19-cr-191

JUDGE MARBLEY

INFORMATION

18 U.S.C. §2
18 U.S.C. §1035
21 U.S.C. §841(a)(1)
21 U.S.C. §841(b)(1)(E)(i)
21 U.S.C. §846

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1
(False Statements Relating to Health Care Matters)
[18 U.S.C. §1035]

From on or about January 1, 2017 through on or about December 31, 2017, in the Southern District of Ohio, Defendant MICHAEL ALEXANDER, knowingly and willfully caused the making of materially false, fictitious, and fraudulent representations to a health care benefit program as defined in 18 U.S.C. §24, to wit: the Ohio Medicaid program, in connection with the delivery of or payment for health care benefits, items, or services by knowingly causing fraudulent claims to be submitted under his name and provider number when no services were provided or were provided by another physician, and by allowing a suspended provider to bill Medicaid using Dr. Alexander's name and provider number.

In violation of 18 U.S.C. §1035 and §2.

COUNT 2
Conspiracy to Distribute and Dispense a Controlled Substance
[21 U.S.C. §846]

2. From on or about January 1, 2016 through on or about December 31, 2018, in the Southern District of Ohio, Defendant MICHAEL ALEXANDER, did knowingly and willfully combine, conspire, confederate and agree with others, both known and unknown to the United States Attorney, to violate 21 U.S.C. §841(a)(1) and §(b)(1)(E)(i) and that is, to knowingly, intentionally, and unlawfully cause the distribution and dispensing of a mixture and substance containing a detectable amount of buprenorphine and naloxone (namely Suboxone), a schedule III controlled substance, outside the usual scope of professional practice and without a legitimate medical purpose.

In violation of 21 U.S.C. §846.

BENJAMIN C. GLASSMAN
UNITED STATES ATTORNEY



MARITSA A. FLAHERTY (0080903)
Assistant United States Attorney



KENNETH F. AFFELDT, (0052128)
Assistant United States Attorney